



INTERNATIONAL JELLY & PRESERVE ASSOCIATION

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Founded in 1918 as
National Preservers Association

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USDA NATIONAL
ORGANIC PROGRAM

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August 12, 2005

Mr. Arthur Neal
Director
Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave, S.W.
Room 4008
So. Ag. Stop 0268
Washington, DC 20250

**RE: Docket Number: TM-04-07; Advance Notice of Proposed
Rulemaking on National Organic Program; Sunset Review**

Dear Mr. Neal:

The International Jelly and Preserve Association (IJPA) appreciates the opportunity to submit comments to the United States Department of Agriculture on the National Organic Program Sunset Review related to the continued use of 165 synthetic and non-synthetic substances on the National List of Allowed and Prohibited Substances for organic agricultural production and handling (70 *Federal Register* 53177; June 17, 2005). IJPA represents the majority of manufacturers of jellies, preserves and fruit butters in the United States and now operates as the Fruit Spread Section under the umbrella of the Juice Products Association, which represents the juice and juice products industry in the U.S. and overseas.

We believe the National Organic Program should allow the continued use of the 165 synthetic and non-synthetic substances identified on the National List for organic production and handling. The continued use of these substances will encourage product innovation and allow manufacturers to take advantage of technological advances in the growing organic segment.

In particular, we strongly urge the Agency to continue to allow the use of low-methoxy pectin in Section 205.605, "Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic ("specified ingredients or food groups(s))." Low-methoxy pectin is

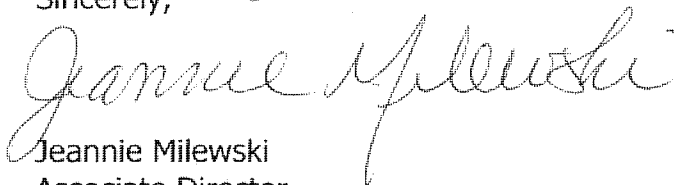
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used in the production of low sugar jams currently labeled as "organic" that are a large part of the organic fruit spread market in the United States. If low-methoxy pectin is not allowed in the production of organic products, these products could not be made, as there is currently no alternative. It is important that a broad spectrum of organic fruit spread products is available to provide consumers of organic products with the best choices for their lifestyle whether they are concerned with diabetes, obesity, optimal weight maintenance or other issues.

Additionally, the European Union (EU) allows the use of pectin in organic products as outlined in Council Regulation (EEC) No 2092/91 on organic production of agricultural products and indications referring thereto on agricultural products and foodstuffs. Therefore, U.S. manufacturers could sell low sugar fruit spreads in the EU but not in the U.S., thereby eliminating this choice for American consumers. Also of note, the EU regulation does not differentiate between low-methoxy pectin and high-methoxy pectin in organic production as the U.S. regulations do, i.e., Section 205.605 specifies low-methoxy pectin while Section 205.606 specifies high methoxy pectin.

We appreciate your consideration of these comments. If we can be of further assistance, please advise.

Sincerely,



Jeannie Milewski
Associate Director